

MEMO ENDOR

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April 25, 2020

VIA ECF

Honorable Kenneth M. Karas
United States District Judge
United States District Court
Southern District of New York
300 Quarropas Street
White Plains, New York 10601

Re: *United States v. Goldbrener*, 7:18-CR-614-1 (KMK)

Dear Judge Karas:

We represent Simon Goldbrener, a defendant in the above referenced matter. I write to respectfully request an adjournment of Mr. Golbrener's sentencing date and deadline to respond to his presentence report.

We received the draft PSR on April 21, 2020. Due to the current pandemic, we will not be able to adequately review the presentence report with our client prior to the May 5 deadline. We are therefore requesting an adjournment of our time to respond to the draft PSR to May 19, 2020.

Additionally, Mr. Goldbrener's sentencing hearing is currently scheduled for June 8, 2020 at 2:00 p.m. before Your Honor. Due to difficulties and illness related to the Covid-19 pandemic, we respectfully request an extension of the sentencing date to the first week of August.

We are asking for a date outside the three weeks between July 9 and July 30, 2020 that are a period of mourning in the Jewish calendar and court appearances during that time period are discouraged. The nine days between July 21 and July 30 are especially restrictive, culminating in Tishaa B'av, a day of restrictive mourning and fasting.¹

¹ See case docket Document No. 110 at Note 1; Eric Creizman, Esq.'s letter on behalf of defendant Sholem Steinberg, elaborates on the significance and restrictions of this three week time period.

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I have communicated with A.U.S.A. Michael Maimin and he advised that the Government consents to these requests.

Thank you for Your Honor's consideration of this matter.

Very truly yours,

/s/ Shulamis Peltz

Shulamis Peltz

cc: A.U.S.A.'s Michael Maimin, Hagen Scotten, Vladislav Vainberg, (via email and ECF)
U.S.P.O. Sara Willette (via email)

*Granted. The Court
will go forward with
the sentence on
6/30/20 at 11:00 A.M.*

SO ORDERED


KENNETH M. KARAS U.S.D.J.

4/28/20